



28 May 2019

Thomas Lozanov  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Submitted via email: thomas.lozanov@aemc.gov.au

Dear Mr Lozanov,

### **TRANSPARENCY OF NEW PROJECTS (ERC0257) – CONSULTATION PAPER**

Origin Energy Limited (Origin) welcomes the opportunity to comment on the AEMC's review of three rule changes that address information transparency of new projects in the NEM.

The AEMC should be cautious in allowing the disclosure of information that inadvertently hinders competitive advantage. In evaluating the rule changes, the AEMC should detail what information is to be disclosed and assess its value in providing greater market transparency while also ensuring the risk of revealing commercially sensitive information is minimised.

The Rule changes have proposed that information is released at the connection enquiry stage. In our view this is too early and runs the risk of undermining any first mover advantage and could dissuade development. This information also has the potential to mislead given the low numbers of connection enquiries reaching completion. Origin recommends that information is only disclosed at the 'Connection Application' Stage as project details such as generator design and land acquisitions have been further progressed.

#### *AEMO's Generation Information Page and Updating Information*

Origin supports the requirement for AEMO to update its generation information page each month. Having a central register of information for all connections and major project stages will enable greater information dissemination and support investment decisions. Information disclosed by TNSPs should also be collated here.

In our view only the disclosure of major changes in project status are required, which can be updated via an online portal administered by AEMO. Examples of major changes include pre-feasibility; feasibility; final investment decision; project execution; project completion; and project cancellation. Updates should only be required monthly, which aligns with the timeframe for updating AEMO's generation information page.

Part 4 of the AEC's Rule change proposal seeks to allow AEMO to disclose information that is in the public domain. Origin anticipates that the requirement to update major changes in project status each month would make this change somewhat redundant.

#### *ENA proposal for TNSP information disclosure*

The rule change calls for information at the connection enquiry stage to be disclosed. At this early stage many of the project details have not been decided and there are concerns that commercial information will be released to the market. Origin believes that if the AEMC decides to allow the release of information, it should only be at the connection application stage where project details are more finalised.

The ENA has proposed disclosing name, size, location, completion date, primary technology and function information. The AEMC should assess which of these is relevant to further information transparency in the NEM and not risk commercial disclosure. Origin contends that the name of the proponent and a specific completion date should not be disclosed due to commercial sensitivities. It is

not necessary to know who will be developing the project and disclosing a specific estimated completion date has the potential to mislead where project timeframes are extended. In our view any requirement for information disclosure should be limited to the size, location, and name of the project, as well as the completion year, and primary technology. The decision to disclose more specific information should be left to the proponent.

In order to maintain a centralised information repository, TNSPs should be required to pass on details to AEMO which will allow them to update their generation information page each month.

*Developers becoming 'Intending Participants'*

Origin continues to support allowing developers to become 'Intending Participants' by amending Rule 2.7. Access to key information will allow developers to make more informed decisions relating to important factors such as site selection. This could in turn give participants greater certainty around which developments are likely to materialise.

It is important that confidentiality of information is maintained by developers under the NER. The AEMC should examine what legal avenues are available to enforce confidentiality breaches if the developer ceases to be an 'intending participant' and thus not subject to the NER.

Should you have any questions or wish to discuss this information further, please contact me via email [james.googan@originenergy.com.au](mailto:james.googan@originenergy.com.au) or phone, on (07) 3512 4138.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Steve Reid', with a stylized flourish at the end.

Steve Reid  
Group Manager, Regulatory Policy  
Origin Energy